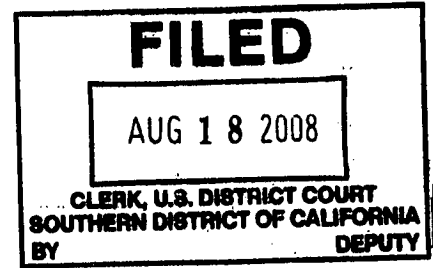


August 8, 2008



Clerk U.S. District Court  
Southern District of California  
4290 Edward J. Schwartz Federal Bldg.  
880 Front Street  
San Diego, CA 92101-8900

**08 CR 2772 JLS**

RE: United States of America vs Jorge A. Rodriguez Sanchez  
Cr. No. 08-285(EDPA)

Dear Clerk:

We herewith enclose the original record, together with a certified copy of the docket entries, in the above captioned case which has been transferred to your District pursuant to Rule 20 Consent to Transfer of Case for Plea and Sentence(Under Rule 20).

Kindly acknowledge receipt on the copy of the letter provided.

Very truly yours,

MICHAEL E. KUNZ  
Clerk of Court

By:

  
James Hamilton, Deputy Clerk

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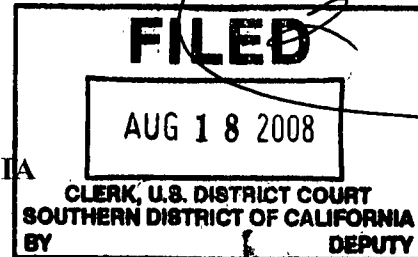
Received above material or record file this    day of    ,

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

crfl

CP

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA



UNITED STATES OF AMERICA )

Criminal Case No. 08CR00285-GP-1

Plaintiff, )

v. )

JORGE A. RODRIGUEZ SANCHEZ, )

Defendant. )

'08 CR 2772 JLS  
FILED

AUG 7 2008  
MICHAEL KUNZ, Clerk  
By Dep. Clerk

U.S. DEPT. OF JUSTICE  
U.S. ATTORNEY E.D. OF PA  
2008 JUL -7 P 12:15

Consent to Transfer of Case  
for Plea and Sentence  
(Under Rule 20)

I, JORGE A. RODRIGUEZ SANCHEZ, defendant, have been informed that an indictment (indictment, complaint) is pending against me in the above designated cause. I wish to plead guilty (guilty, nolo contendere) to the offense charged, to consent to the disposition of the case in the Southern District of California in which I am held (am under arrest, am held) and to waive trial in the above captioned District.

Dated: 29 May 08, at San Diego, CA

Jorge Alan Rodriguez Sanchez  
JORGE A. RODRIGUEZ SANCHEZ  
(Defendant)

[Signature]  
(Witness)

[Signature]  
(Counsel for Defendant)

Approved

First Assistant U.S. Attorney

[Signature]

United States Attorney for the  
Eastern District of Pennsylvania

[Signature] 7/8/08

MAREN P. HEWITT

United States Attorney for the  
Southern District of California

U.S. DEPT. OF JUSTICE  
U.S. ATTORNEY E.D. OF PA

for

1

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GP  
UNITED STATES OF AMERICA

v.

JORGE A. RODRIGUEZ SANCHEZ

: CRIMINAL NO. 08-285

:

:

:

:

:

DATE FILED: May 21, 2008

**VIOLATIONS:**

21 U.S.C. § 846 (conspiracy to distribute controlled substances and use a communication facility to facilitate the distribution of controlled substances - 1 count)

21 U.S.C. § 841 (distribution of controlled substances - 4 counts)

Notice of forfeiture

**FILED**  
MAY 21 2008  
By MICHAEL E. KUNZ, Clerk  
Dep. Clerk

INDICTMENT

COUNT ONE

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

**INTRODUCTION**

1. The Controlled Substances Act ("CSA") governed the manufacture, distribution, and dispensing of controlled substances in the United States.

2. Various prescription drugs were scheduled as controlled substances, pursuant to the CSA. There were five schedules of controlled substances, denominated as Schedules I through V. Drugs were placed on schedules based on their potential for abuse, among other things. Drugs were placed on Schedule II when abuse of them may lead to severe psychological or physical dependence, on Schedule III when abuse of them may lead to moderate or low physical dependence or high psychological dependence, on Schedule IV when abuse of them may lead to more limited physical dependence or psychological dependence when

compared to substances on Schedule III.

3. Federal regulations required that, for a prescription for a controlled substance to be effective, it must be issued for a legitimate medical purpose by a medical practitioner acting in the usual course of his professional practice. A prescription not issued in this manner was not valid. Medical practitioners issuing such purported prescriptions and pharmacists knowingly filling such purported prescriptions were subject to the penalties provided for in the CSA.

4. Controlled substances may only be handled, imported, distributed, or dispensed by persons registered with the United States Attorney General, through the Drug Enforcement Administration ("DEA") to do so, with some exceptions, such as delivery persons. Defendant JORGE A. RODRIGUEZ SANCHEZ was not registered with the DEA to handle, import, distribute, or dispense controlled substances.

5. Oxycodone is a Schedule II controlled substance and is commonly sold under the brand names Oxycontin, Percocet, and Endocet.

6. Hydrocodone is an analgesic agent and a Schedule II controlled substance. When combined with analgesics such as acetaminophen, it is classified as a Schedule III controlled substance. It is commonly sold as a Schedule III controlled substance under the brand name Vicodin.

7. Methylphenidate is a central nervous system stimulant and Schedule II controlled substance. It is commonly sold under the brand name Ritalin.

8. Diazepam and alprazolam are central nervous system depressants and Schedule IV controlled substances, commonly sold under the brand names Valium and Xanax.

9. From at least in or about June 2002 through on or about April 9, 2008, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JORGE A. RODRIGUEZ SANCHEZ**

conspired and agreed, with others known and unknown to the grand jury, to: (a) knowingly and intentionally distribute controlled substances, including, but not limited to oxycodone, a Schedule II controlled substance, hydrocodone, a Schedule II and III controlled substance, methylphenidate, a Schedule II controlled substance, diazepam, a Schedule IV controlled substance, and alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and (b) use a communication facility in facilitating the knowing and intentional distribution of controlled substance, in violation of Title 21, United States Code, Section 843(b).

**MANNER AND MEANS**

It was a part of the conspiracy that:

10. The e-mail address pharmavet@hotmail.com was listed on websites which advertised controlled and non-controlled prescription drugs for sale.

11. Customers sent orders for controlled substances to the e-mail address pharmavet@hotmail.com, which was used by defendant JORGE A. RODRIGUEZ SANCHEZ. Once the terms of the transactions were agreed upon, the customers were requested to wire the payments for the drugs to defendant RODRIGUEZ SANCHEZ and others known and unknown to the grand jury via Western Union and send the identification number provided by Western Union, called a Money Transaction Control Number ("MTCN"), to pharmavet@hotmail.com.

12. Defendant JORGE A. RODRIGUEZ SANCHEZ sold controlled substances and other drugs to customers without requiring a prescription or physical examination by a licensed physician.

13. The money sent by the customers in payment for the controlled substances and drugs was picked up by others known and unknown to the grand jury at a Western Union location in Mexico.

14. Defendant JORGE A. RODRIGUEZ SANCHEZ caused the controlled substances and other drugs to be shipped from Southern California via the United States Mail, United Parcel Service, Federal Express, or DHL to customers in the United States, including the Eastern District of Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 17, 2006, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JORGE A. RODRIGUEZ SANCHEZ**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of a mixture and substance containing a detectable amount of oxycodone, that is, approximately 50 10-mg tablets of Endocet, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 11, 2006, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JORGE A. RODRIGUEZ SANCHEZ**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of a mixture and substance containing a detectable amount of oxycodone, that is, approximately 25 80-mg tablets of Oxycontin, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 1, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JORGE A. RODRIGUEZ SANCHEZ**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of a mixture and substance containing a detectable amount of oxycodone, that is, approximately 30 80-mg tablets of Oxycontin, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 27, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JORGE A. RODRIGUEZ SANCHEZ**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of a mixture and substance containing a detectable amount of methylphenidate, that is, approximately 240 10-mg tablets of Ritalin, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendant

**JORGE A. RODRIGUEZ SANCHEZ**

shall forfeit to the United States of America:

- (A) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses; and
- (B) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$1.5 million.

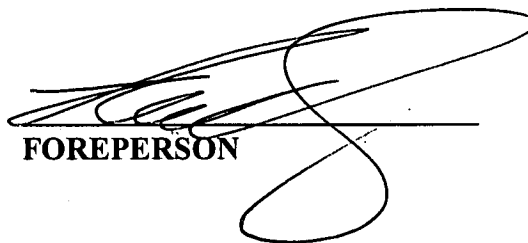
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the Court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property which cannot be divided without difficulty;

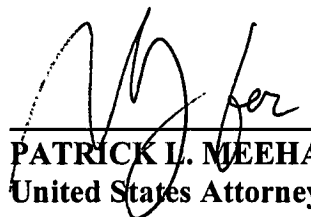
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**



FOREPERSON



PATRICK L. MEEHAN  
United States Attorney



CLOSED

**United States District Court  
Eastern District of Pennsylvania (Philadelphia)  
CRIMINAL DOCKET FOR CASE #: 2:08-cr-00285-GP-1  
Internal Use Only**

Case title: USA v. RODRIGUEZ SANCHEZ

Date Filed: 05/21/2008

Date Terminated: 08/07/2008

Assigned to: HONORABLE GENE  
E.K. PRATTER

**Defendant (1)**

**JORGE A. RODRIGUEZ SANCHEZ**

*TERMINATED: 08/07/2008*

**Pending Counts**

None

**Disposition**

**Highest Offense Level (Opening)**

None

**Terminated Counts**

21:846- CONSPIRACY TO  
DISTRIBUTE CONTROLLED  
SUBSTANCE AND USE A  
COMMUNICATION FACILITY TO  
FACILITATE THE DISTRIBUTION  
OF CONTROLLED SUBSTANCE.  
(1)

21:841(a)(1),(b)(1)(C)  
DISTRIBUTION OF OXYCODONE  
AND METHYLPHENIDATE AND  
18:2 AIDING AND ABETTING.  
(2-5)

**Disposition**

DISMISSED.

DISMISSED.

**Highest Offense Level (Terminated)**

Felony

A TRUE COPY CERTIFIED TO FROM THE RECORD

DATED: 8-8-08

ATTEST: [Signature]

DEPUTY CLERK, UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

**Complaints**

None

**Disposition**

**Plaintiff**

USA

represented by **FRANK R. COSTELLO**  
 UNITED STATES ATTORNEY'S  
 OFFICE  
 615 CHESTNUT STREET  
 SUITE 1250  
 PHILADELPHIA, PA 19106  
 215-861-8442  
 Email: frank.costello@usdoj.gov  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
05/27/2008	<u>1</u>	INDICTMENT as to JORGE A. RODRIGUEZ SANCHEZ (1) count(s) 1, 2-5. (rs, ) (Entered: 05/27/2008)
08/07/2008	<u>2</u>	CONSENT TO TRANSFER JURISDICTION (Rule 20) to Southern District of California Counts closed as to JORGE A. RODRIGUEZ SANCHEZ (1) Count 1,2-5. (jh, ) (Entered: 08/08/2008)
08/07/2008		(Court only) ***JS-3 Closing Information, ***Case Terminated as to JORGE A. RODRIGUEZ SANCHEZ, ***Procedural Interval start as to JORGE A. RODRIGUEZ SANCHEZ (jh, ) (Entered: 08/08/2008)
08/07/2008		(Court only) ***Update Disposition Information: (jh, ) (Entered: 08/08/2008)